

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

COALITION TO MARCH ON THE RNC,

Plaintiff,

v.

Case No. 24-CV-704

CITY OF MILWAUKEE,
CAVALIER JOHNSON in his official capacity
as Mayor of the City of Milwaukee, and
JERREL KRUSCHKE in his official capacity as
Commissioner of Public Works for the City of Milwaukee,

Defendants.

**DECLARATION OF MILWAUKEE POLICE DEPARTMENT
CAPTAIN TIMOTHY GAUERKE**

STATE OF WISCONSIN)

MILWAUKEE COUNTY)

I, Timothy Gauerke hereby make the following declaration:

1. I am an adult resident of the State of Wisconsin and
2. I have been employed with the Milwaukee Police Department (“MPD”) since October 9, 2006, for approximately 17 years. I currently hold the rank of Captain.
3. This declaration is made in support of Defendants’ Brief in Opposition to Plaintiff’s Motion for a Preliminary Injunction in the above-captioned matter.
4. I have been involved in the City of Milwaukee’s, (“City’s”) efforts to plan the 2024 Republican National Convention (“RNC”) to be held in the City from July 15-18. This has included working closely with the United States Secret Service

(“Secret Service”), which serves as the lead federal agency for this National Security Special Event (“NSSE”).

5. Working with the Secret Service, MPD and other law enforcement agencies and public safety organizations have been involved in designing, planning, and implementing security measures for the RNC. This collaborative process calls upon experts in a wide variety of subject matters, such as health and safety, emergency response, and traffic flow to name a few.
6. My work, and the work of MPD, in preparing for security issues connected with the RNC has taken significant amounts of time on a daily basis for months and will continue through the event.
7. MPD does not plan the convention itself; rather, the Committee on Arrangements decides what venues will be used and what events take place during the RNC. Based on those decisions, MPD contributes to and participates in making decisions about traffic flow, use of City streets, and use of City parks or other parks over which the City has temporary jurisdiction.
8. The extraordinary efforts of MPD to maintain public security and facilitate the needs of all who live, work, or travel in the City, are balanced with the First Amendment rights of residents and visitors.
9. MPD has undertaken to ensure that residents and visitors alike have access to emergency services, access to their homes and businesses, and have their transportation needs met; additionally, MPD has planned for provision of sufficient law enforcement support for needs around the City unrelated to the RNC.

10. In order to ensure sufficient law enforcement resources exist to meet the needs of the NSSE, the City will execute separate contracts with approximately 80 political subdivisions within the state. The City will also contract with the State of Wisconsin to draw in other states' law enforcement personnel through the Emergency Management Assistance Compact and for National Guard service members operating in State Active Duty status.
11. MPD has worked closely with the Secret Service to ensure that, in the event that medical emergencies or fires within the vehicle screening zone, there will be adequate and well-placed equipment and ingress/egress routes to facilitate rapid response. This type of response may be required for the RNC venues and individuals accessing the secure perimeter; however, this response is also required for the individuals and structures found within the vehicle screening zone.
12. To accomplish these important public safety objectives, MPD has worked closely with the Secret Service to ensure that there are multiple routes for emergency vehicles to access areas located east of the RNC venues. These plans include maintaining the ability for emergency vehicles to cross Water Street, the Milwaukee River, and Dr. Martin Luther King, Jr. Drive at State Street, Kilbourn Avenue, and Wells Street. This staging is essential to being able to expeditiously access areas of concentrated commercial activity, such as the bars, restaurants and hotels to the east of the RNC venues.
13. There are extraordinary logistical aspects of implementing a transportation plan that allows for the safe and orderly traffic flow, as well as arrival and departures of delegates to and from an event of this size and magnitude.

14. Changes in the security planning at this stage will have ripple effects on many other interrelated decisions and considerations. Each major event related to the RNC presents logistical issues concerning transportation, traffic flow, and public safety, which in turn may require logistical decisions by the City and may influence other decisions about appropriate security for that event, for other contemporaneous events, and for the City as a whole.
15. A critical part of the security planning process depends on intelligence gathering. The law enforcement community is actively working to detect any plans to attack or otherwise illegally disrupt the RNC, and MPD may alter security strategies as necessary based on intelligence information it develops or receives.

I declare under penalty of perjury that the foregoing is true and correct. Executed on June 21, 2024.

s/Timothy Gauerke
CAPTAIN TIMOTHY GAUERKE

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